

# Federal Defenders OF NEW YORK, INC.

Eastern District  
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**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ JUL 25 2006 ★

July 21, 2006

BROOKLYN OFFICE

**Via Facimile**

The Honorable Steven M. Gold  
United States Magistrate Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn New York 11201

Re: United States v. Ivan Mauricio Moreno, 06 CR 425 (G)

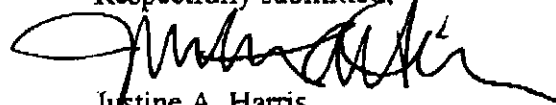
Your Honor:

My client, Ivan Moreno, is charged with possession with intent to distribute heroin. Mr. Moreno was released on a \$500,000 bond. Under the terms of the bond, his travel is restricted to the five boroughs of the City of New York.

Yesterday, July 20, 2006, the Immigration and Customs Enforcement case agent arrested and detained Mr. Moreno's girlfriend, Tatyana Sotelo, on deportation charges. Ms. Sotelo is currently being detained at the Elizabeth Detention Center in New Jersey. I respectfully request that Your Honor modify Mr. Moreno's bond to permit him to travel to New Jersey to visit Ms. Sotelo.

AUSA Elizabeth Latif has no objection to our request.

Respectfully submitted,



Justine A. Harris  
Staff Attorney  
(718) 407-7403

cc: AUSA Elizabeth Latif  
United States Pre-Trial Services

s/Steven Gold

Application Granted  
USM  
7/21/06